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MAIL BRANCH

CERTIFICATE SETTING FORTH PROOF OF SERVICE
PURSUANT TO 47 CFR 1.47

The undersigned hereby declares that he caused an original and four copies of (1) REQUEST TO FILE REPLY COMMENT IN RESPONSE TO REPLY COMMENT OF UNITED STATES MARINE CORPS, and (2) SECOND REPLY COMMENT (RM-8362), to be deposited in First Class U.S. Mail, addressed to Secretary, Federal Communications Commission, Washington, DC 20554, on April 16, 1994.

I declare under penalty of perjury under the laws of the State of New Jersey that the foregoing is true and correct.

DATED: April 16, 1994

By:


Steven R. Bartholomew

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MAIL BRANCH

In the Matter of Amendment of Section 73.202(b)
Table of Allotments, FM Broadcast Stations
San Clemente, CA - Channel 285A

MM Docket No. 93-295, RM-8362
FEDERAL COMMUNICATIONS COMMISSION
DA 93-1351

REQUEST TO FILE REPLY COMMENT IN RESPONSE TO
REPLY COMMENT OF UNITED STATES MARINE CORPS

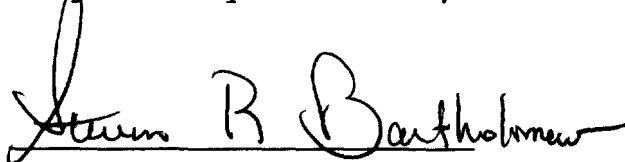
PETITIONER: STEVEN R. BARTHOLOMEW

Federal Communications Commission
Washington, DC 20554

The Petitioner respectfully requests the Commission to accept the Second Reply Comment which is submitted simultaneously herewith. In support of the Request, Petitioner states:

1. The Reply Comments submitted by the United States Marine Corps on March 30, 1994 set forth concerns related to air safety.
2. Petitioner's Reply Comments are directed to addressing these concerns.

Respectfully submitted,



Steven R. Bartholomew
194 Wyndham Place
Robbinsville, NJ 08691
(W): 908-957-3250
(H): 609-490-0555

Dated: April 15, 1994

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MAIL BRANCH

In the Matter of Amendment of Section 73.202(b)
Table of Allotments, FM Broadcast Stations
San Clemente, CA - Channel 285A

MM Docket No. 93-295; RM-8362
FEDERAL COMMUNICATIONS COMMISSION
DA 93-1351

SECOND REPLY COMMENT

PETITIONER: STEVEN R. BARTHOLOMEW

Federal Communications Commission
Washington, DC 20554

The Reply Brief prepared by the United States Marine Corps on March 30, 1994 states that the Marine Corps will reject proposals to build transmitter towers on property within the contiguous borders of Camp Pendleton. According to the Marine Corps, such towers would represent a hazard to air navigation. Since one of the two sites proposed by the Petitioner -- namely, the Southern California Edison (SCE) site -- is on land leased from Camp Pendleton, the Petitioner hereby amends its proposal with respect to the SCE site.

Petitioner proposes to side-mount an FM broadcast antenna on one of the existing microwave towers referred to in the Marine Corps Reply Comment. Petitioner will use a broad-band antenna equipped to transmit signals from a plurality of VHF transmitters. For example, a similar antenna is shared by radio stations WTMI (93.1), WLVE (93.9), WZTA (94.9) and several others in Miami, FL.

Petitioner's antenna will be shared with the United States Marine Corps. The Marine Corps may use the antenna to provide a low-power, on-air FM signal throughout Camp Pendleton. In this manner, Camp personnel will be able to tune in to the Armed Forces Radio Network (AFRN) without having to connect to a cable feed. It will be possible to listen to the signal virtually

anywhere on the Camp, outdoors and in buildings, using any convenient FM radio, such as portable walkman-type radios, car radios, etc. Note that such a service (AFRN) is currently provided in King Salmon, Alaska on 101.7 MHz, using 300 watts.

Depending upon the specific needs and requirements of the Marine Corps, the Petitioner's antenna can be adapted for uses in addition to FM broadcast. For example, the antenna could be designed to carry transmissions in the 108-137 MHz aircraft band, TV channel 6, or in another convenient VHF frequency range as the Marine Corps sees fit to select.

As an alternative to using Petitioner's antenna to transmit two signals, the Petitioner offers the Marine Corps full use of Petitioner's SCA (subsidiary communications authority) channels. 24 hour-a-day, 7 day-a-week operation is possible. SCA channels are blended into the main carriers of existing FM broadcast stations as subcarriers. These subcarriers are capable of carrying various types of audio and/or data programming, independent of the programming carried by the main channel. Specially-adapted FM radios are used to receive the SCA signals.

Petitioner's SCA subcarrier may be advantageously utilized to transmit AFRN broadcasts throughout the Camp Pendleton area. In addition to voice programming, the SCA subcarriers may be used to carry encrypted data signals, paging signals, navigational information, or other types of useful information. Through the utilization of proper encryption and scrambling schemes, the subcarrier can be used as part of a secure communications or broadcast network. In this manner, the Marine Corps receives the benefits of a powerful FM broadcast signal capable of providing a high degree of security.

With respect to Petitioner's "ATSF" site, this site is not on Camp Pendleton property. Since the site is actually a strip of land several miles long, it is potentially misleading to suggest that it borders Camp Pendleton. Although the ATSF

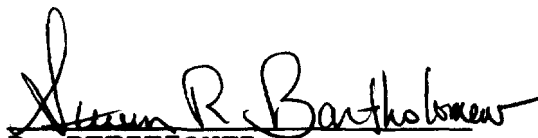
site shares a 100' border with the San Onofre State Park, much of the ATSF site lies several miles from the nearest Camp Pendleton boundary.

The potential hazard to air navigation changes dramatically, depending upon which specific portion of the ATSF site Petitioner proposes to use. Portions of the ATSF site lie relatively close to air traffic paths used by Camp Pendleton, whereas other portions of the ATSF site are far removed from these paths. Consequently, the Petitioner seeks further input from Camp Pendleton officials related to safe tower locations on the ATSF tract.

The Petitioner requests a meeting with the United States Marine Corps. At the meeting, the Petitioner will explain to the Marine Corps the details of the Proposal, as well as the manner in which the proposal may benefit the Marine Corps. For purposes of this Rulemaking Procedure, Petitioner is required to show the (theoretical) availability of a site which is fully spaced with respect to KKGO, KCBQ, and KDES. However, Petitioner is not obligated to actually operate from such a site. FCC Rules governing the use of directional antennas provide flexibility in selecting a suitable transmitter location.

It is the Petitioner's present intention to apply for Channel 285A if this allotment is retained at San Clemente. If Petitioner is authorized to construct a station on Channel 285A, Petitioner will build the station promptly.

Respectfully Submitted,



By PETITIONER,
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CERTIFICATE SETTING FORTH PROOF OF SERVICE

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(1)

Stanley S. Neustadt
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Washington, DC 20036-1573


(2)

M. E. Lowe
Colonel, U.S. Marine Corps
Chief of Staff
Box 555010
Camp Pendleton, CA 92055-5010

I declare under penalty of perjury under the laws of the State of New Jersey that the foregoing is true and correct.

DATED: April 16, 1994

By:


Steven R. Bartholomew